

SCHROTH & SCHROTH  
ROBERT E. SCHROTH, JR, ESQ. (SBN 212936)  
2044 First Avenue, Suite 200  
San Diego, California 92101  
Telephone: (619) 233-7521  
Facsimile: (619) 233-4516

Attorney for Material Witnesses, Joana Elizabeth Vasquez-Quesada, Hugo Romero-Lopez, and Jose Aristedes Martinez-Ardon.

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

(Hon. Peter C. Lewis)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Ramon Macias-Colmenares,

Defendant.

) Criminal Case No.: 07 CR 2916  
) Magistrate Case No.: 07 MJ 08841-PCL  
)

**MOTION FOR MATERIAL WITNESS  
VIDEOTAPED DEPOSITION**

) Date: December 4, 2007  
) Time: 1:30 pm  
) Judge: Hon. Peter C. Lewis  
)

**TO UNITED STATES ATTORNEY CAROL C. LAM, ASSISTANT UNITED  
STATES ATTORNEY JOHN F. WEIS; TO ATTORNEY FOR DEFENDANT, RAMON  
MACIAS COLMENARES, FREDRICK MATTHEW CARROLL; DEBRA MIKA,  
SCOTT PACTOR; BEATRICE ARANA, DONALD A NUNN;**

NOTICE IS HEREBY GIVEN that on December 4, 2007, at 1:30 p.m., or as soon  
thereafter as the matter may be heard, in the courtroom of Honorable Judge Peter C. Lewis of  
this court, located at 2003 W. Adams Ave, Ste 220, El Centro, California 92243, Material  
Witnesses, Joana Elizabeth Vasquez-Quesada, Hugo Romero-Lopez, and Jose Aristedes

MOTION FOR MATERIAL WITNESS VIDEOTAPED DEPOSITION

U. S. v. Macias Colmenares  
07 MJ 8841

1 Matrinez-Ardon by and through their attorney of record, Robert E. Schroth, Jr., will move the  
2 court for an order authorizing the videotaped depositions of all three material witnesses.

3 The motion will be made on the ground that there is good cause for the order requested  
4 in that the material witnesses know of no sureties in this country who will bond them out of  
5 U.S. Marshall's custody, where they are being held at the ICJ detention facility located in El  
6 Centro, California during the pendency of this matter. Neither the interests of justice nor the  
7 convenience of the parties and witnesses will be served by requiring the material witnesses to  
8 remain in the ICJ until the matter is concluded.  
9  
10

11 DATED: November 19, 2007

**SCHROTH & SCHROTH**

14 By: s/ Robert E. Schroth, Jr.  
15 ROBERT E. SCHROTH, JR,  
16 Attorney for Material Witnesses  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28